

Application No.: 09/517952

Docket No.: MWS-037RCE

REMARKS

Upon entry of this amendment, claims 1-2, 4-20, 22-36, and 38-53 are pending, of which claims 1, 19, 35, and 53 are independent. No claims are amended. Applicants respectfully submit that the pending claims define over the art of record.

Applicants amend the specification as set forth above. No new matter is added. Applicants respectfully request that the Examiner enters the amendment to the specification.

Claim rejection of claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53

Claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53 are rejected under 35 U.S.C. §103(a) as being unpatentable over "A Knowledge Based Electronic Information and Documentation System", ACM, 2000 by Young et al. (hereafter "Young") in view of "SGML nets: Integrating Document and Workflow Modeling", IEEE, 1998 by Weitz (hereafter "Weitz") further in view of United States Patent No. 6,101,489 to Lannert et al. (hereafter "Lannert"). Applicants respectfully submit that the combination of Young, Weitz, and Lannert does not teach or suggest each and every element of claims 1-2, 4-9, 11-20, 22-27, 29-36, 38-43, and 45-53. Specifically, the combination does not teach and suggest the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation as required by independent claims 1, 19, 35, and 53.

The Examiner suggests on Page 30 of the Office Action that one of ordinary skill can combine the system of Young including at least one of the reporting components configured to define an operation to bi-directionally communicate with a technical computing environment with the system of Lannert that includes user interface components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation to achieve the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation as required by independent claims 1, 19, 35, and 53. Applicants respectfully disagree.

Application No.: 09/517952

Docket No.: MWS-037RCE

The Examiner speculates that Young teaches bi-directionally communication between a reporting component ("A") and a technical computing environment ("B") and that Lannert teaches bi-directionally communication between a user interface component ("C") and a simulation of a model ("D"). However the claimed invention requires the communication between a reporting component ("B") and a simulation of a model ("D"). In simpler terms, given that Young teaches communication between A and B and Lannert teaches communication between C and D, the combination does not teach or suggest the communication between B and D as required by the pending independent claims. Therefore, Applicants respectfully submit that Young and Lannert fails to teach or suggestion the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation as required by the pending independent claims.

Additionally, Weitz fails to cure the deficiency of Young and Lannert. Weitz discusses the use of SGML nets for document management. Nowhere does Weitz teach or suggest the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation. Hence, the combination of Young, Lannert, and Weitz does not teach or suggest the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation as required by the pending independent claims.

Furthermore, Applicants respectfully submit that the combination of Young, Lannert, and Weitz further does not teach or suggest the element of generating a report from the processing of the reporting components of the *report template*, which is also required by the pending independent claims. On page 6 and 7 of the Office Action, the Examiner acknowledges that Young does not teach element of the report generator includes a generation engine to generate a report from the processing of the reporting components of the report template, but the Examiner speculates that Weitz teaches this element in page 3, col 2, paragraph 4 and section 4.2.1 on page 4. Applicants respectfully disagree.

The cited sections in Weitz discuss how to select document instances and the use of document templates as a graphical query language. Document templates are used to inscribe arcs

Application No.: 09/517952

Docket No.: MWS-037RCE

in SGML nets. An example for such use is shown in a state diagram in Figure 6. See page 3, col 2, paragraph 5. Details regarding basic elements of document templates as a graphical query language are described in section 4.2.1. of Weitz. Weitz is concerned with how to provide better document and workflow modeling for better document management such as document retrieval, version control, and access control. Nowhere does Weitz discuss generation of a report from the processing of the reporting components of the report template.

Lannert also does not discuss generation of a report from the processing of the report components of the report template. Therefore, the combination of Young, Weitz, and Lannert does not teach or suggest the element of generating a report from the processing of the reporting components of the report template as required by the pending independent claims.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of the pending independent claims 1, 19, 35, and 53.

Dependent claims 2, 4-9, 11-18, 20, 22-27, 29-34, 36, 38-43, and 45-52 depend on one of the pending independent claims and include all the element and limitation of the corresponding independent claim. Accordingly, Applicants respectfully request that the Examiner reconsiders and withdraws the rejection of claims 2, 4-9, 11-18, 20, 22-27, 29-34, 36, 38-43, and 45-52.

Claim rejection of claims 10, 28, and 44

Claims 10, 28, and 44 are rejected under 35 U.S.C §103(a) as being unpatentable over Young in view of Weitz, and further in view of Lannert and "A Prototype Notebook-Based Environment for Computational Tools," IEEE 1998 by Skidmore et al. (hereafter "Skidmore").

Claims 10, 28, and 44 depend on independent claims 1, 19, and 35, respectively, and include all the limitation of the corresponding independent claim. As set forth above, the combination of Young, Lannert, and Weitz, fails to teach or suggest the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation and the element of generating a report from the processing of the reporting components of the report template as required by

Application No.: 09/517952

Docket No.: MWS-037RCE

claims 1, 19, and 35. Applicants respectfully submit that Skidmore also fails to teach these elements.

Skidmore discusses a platform independent, web-based version of a paper-based notebook and further provides support for collaboration and other scientific activities across distributed computing platforms. Nowhere does Skidmore discuss the element of at least one of the reporting components configured to define an operation to bi-directionally communicate with a simulation of a model during an execution of the simulation. Skidmore also does not discuss generation of a report from the processing of the reporting components of the report template. Therefore, Applicants respectfully submit that the combination of Young, Lannert, Weitz, and Skidmore fails to teach or suggest each and every element and limitation of independent claims 1, 19, and 35.

Additionally, Applicants respectfully submit that Skidmore does not teach or suggest the element of initiating one of the reporting components configured to perform the operation of issuing commands to simulate the model as speculated by the Examiner on page 25 of the Office Action. Nowhere in Skidmore does Skidmore mention a report or reporting components, therefore it is not possible for Skidmore to teach or suggest initiating one of the reporting components configured to perform the operation of issuing commands to simulate the model. The cited section in Skidmore by the Examiner discusses an experiment control component that is split into an experiment builder and execution controller, but no reporting components or any equivalents.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 10, 28, and 44.

Application No.: 09/517952

Docket No.: MWS-037RCE

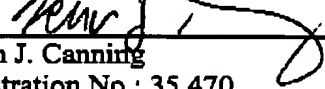
CONCLUSION

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. MWS-037RCE from which the undersigned is authorized to draw.

Dated: July 19, 2005

Respectfully submitted,

By 
Kevin J. Canning
Registration No.: 35,470
LAHIVE & COCKFIELD, LLP
28 State Street
Boston, Massachusetts 02109
(617) 227-7400
(617) 742-4214 (Fax)
Attorney For Applicant